

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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03-MDL-1570 (GBD)(SN)

In Re:

TERROR ATTACKS ON  
SEPTEMBER 11, 2001

**IRAN NOTICE  
OF AMENDMENT**

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This document relates to:

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-6977 (GBD)(SN)  
*Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-7236 (GBD)(SN)  
*York, et al. v. al Qaeda Islamic Army, et al.*, Case No. 03-cv-5493 (GBD)(SN)

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

### CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>New Plaintiff's Name (alphabetical by last name)</b>	<b>New Plaintiff's State of Residency at Filing (or death)</b>	<b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
1	Felt, Shirley A.	New York	U.S. Citizen	Edward P. Felt	Mother	<i>Bauer</i> action <sup>1</sup> Paragraph 35
2	Ferrell, Michele	New Jersey	U.S. Citizen	Donald T. Jones, II	Wife	<i>Bauer</i> action Paragraph 13
3	Foster, Megan	New Jersey	U.S. Citizen	Noel Foster	Daughter	<i>York</i> action <sup>2</sup> Paragraph 8
4	Foster, Nancy	New Jersey	U.S. Citizen	Noel Foster	Wife	<i>York</i> action Paragraph 8
5	Foster, Nicole	New Jersey	U.S. Citizen	Noel Foster	Daughter	<i>York</i> Action Paragraph 8
6	Gallucci, Alyssa	California	U.S. Citizen	Vincenzo Gallucci	Daughter	<i>Bauer</i> action Paragraph 16
7	Gallucci, Angela	New Jersey	U.S. Citizen	Vincenzo Gallucci	Mother	<i>Bauer</i> action Paragraph 16
8	Gallucci, Barbara	New Jersey	U.S. Citizen	Vincenzo Gallucci	Wife	<i>Bauer</i> action Paragraph 16
9	Gallucci, Est. of Joseph	New Jersey	U.S. Citizen	Vincenzo Gallucci	Father	<i>Bauer</i> action Paragraph 16
10	Gallucci, Joseph D.	Washington	U.S. Citizen	Vincenzo Gallucci	Son	<i>Bauer</i> action Paragraph 16
11	Giordano, Michael	New Jersey	U.S. Citizen	Donna Giordano	Son	<i>Bauer</i> action Paragraph 41
12	Glick, Emerson	New Hampshire	U.S. Citizen	Jeremy Glick	Daughter	<i>Bauer</i> action Paragraph 37

<sup>1</sup> *Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-7236 (GBD)(SN), herein referred to as *Bauer* action, was consolidated into the *Ashton* action in the *Ashton* First Amended Consolidated Master Complaint filed on 08/01/2003, ECF No. 32.

<sup>2</sup> *York, et al. v. al Qaeda Islamic Army, et al.*, Case No. 03-cv-5493 (GBD)(SN), herein referred to as *York* action, was consolidated into the *Ashton* action in the *Ashton* First Amended Consolidated Master Complaint filed on 08/01/2003, ECF No. 32.

13	Glick, Jared	New Jersey	U.S. Citizen	Jeremy Glick	Brother	<i>Bauer action Paragraph 37</i>
14	Glick, Jed	New York	U.S. Citizen	Jeremy Glick	Brother	<i>Bauer action Paragraph 37</i>
15	Glick, Jennifer	New Jersey	U.S. Citizen	Jeremy Glick	Sister	<i>Bauer action Paragraph 37</i>
16	Glick, Joan	New Jersey	U.S. Citizen	Jeremy Glick	Mother	<i>Bauer action Paragraph 37</i>
17	Glick, Jonah	Japan	U.S. Citizen	Jeremy Glick	Brother	<i>Bauer action Paragraph 37</i>
18	Glick, Lloyd	New Jersey	U.S. Citizen	Jeremy Glick	Father	<i>Bauer action Paragraph 37</i>
19	Glick-Best, Lyzbeth	New Hampshire	U.S. Citizen	Jeremy Glick	Wife	<i>Bauer action Paragraph 37</i>
20	Glick-Danino, Joanna	New York	U.S. Citizen	Jeremy Glick	Sister	<i>Bauer action Paragraph 37</i>
21	Goldstein, Hanna	New Jersey	U.S. Citizen	Steven Goldstein	Daughter	<i>Bauer action Paragraph 19</i>
22	Goldstein, Harris	New Jersey	U.S. Citizen	Steven Goldstein	Son	<i>Bauer action Paragraph 19</i>
23	Goldstein, Jill	New Jersey	U.S. Citizen	Steven Goldstein	Wife	<i>Bauer action Paragraph 19</i>
24	Gronlund, Est. of Arthur G.	Florida	U.S. Citizen	Linda K. Gronlund	Father	<i>Bauer action Paragraph 38</i>
25	Gronlund, Est. of Doris	New York	U.S. Citizen	Linda K. Gronlund	Mother	<i>Bauer action Paragraph 38</i>

Dated: December 2, 2021

Respectfully submitted,

BAUMEISTER & SAMUELS, P.C.

/s/ Dorothea M. Capone  
COUNSEL FOR PLAINTIFFS  
140 Broadway, 46<sup>th</sup> Floor  
New York, NY 10005  
Phone: (212) 363-1200  
Email: [tcapone@baumeisterlaw.com](mailto:tcapone@baumeisterlaw.com)